



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 30 2019

Mr. Ron Gore
Chief
Alabama Department of Environmental
Management Air Division
1400 Coliseum Boulevard
Montgomery, Alabama 36130

Dear Mr. Gore:

Thank you for submitting the state of Alabama's 2019 annual Ambient Air Monitoring Network Plan (Network Plan) dated July 8, 2019. The Network Plan is required by 40 Code of Federal Regulations (CFR) §58.10. The U.S. Environmental Protection Agency Region 4 understands that the Alabama Department of Environmental Management (ADEM) provided the public a 30-day review period and no comments were received. With this letter, the EPA approves the Alabama Network Plan.

While the EPA approves the replacement of the beta attenuation monitor (BAM) 1020 with the BAM 1022, we cannot approve a national ambient air quality standards (NAAQS) exclusion of the BAM 1022 data at the Ward site (Air Quality System ID 01-119-0003) since there is not a PM_{2.5} federal reference method monitor (FRM) concurrently operating. Once the BAM 1022 is installed and operating, any resulting data will be comparable to the NAAQS. We have enclosed these comments, as well as additional minor comments, on your Network Plan.

Thank you for working with the EPA to monitor air pollution and promote healthy air quality in Alabama. Please let us know of any problems in meeting any of the requirements we have identified. If you have any questions or concerns, please contact Gregg M. Worley at (404) 562-9141 or Darren Palmer at (404) 562-9052.

Sincerely,

A handwritten signature in black ink, which appears to read "Gregg M. Worley", is written over the typed name.

Kenneth L. Mitchell, Ph.D.
Acting Director
Air and Radiation Division

CY 2019 State of Alabama Ambient Air Monitoring Network Plan

U.S. EPA Comments and Recommendations

This document contains the U.S. Environmental Protection Agency comments and recommendations on the state of Alabama's 2019 Ambient Air Monitoring Network Plan (Network Plan). Ambient air monitoring rules, which include regulatory requirements that address network plans, data certification, and minimum monitoring requirements, among other requirements, are found in 40 CFR Part 58. Minimum monitoring requirements for criteria pollutants are listed in 40 CFR Part 58, Appendix D, including those for ozone (O₃), particulate matter less than 2.5 microns (PM_{2.5}), particulate matter less than 10 microns (PM₁₀), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), carbon monoxide (CO), and lead (Pb).

The minimum monitoring requirements are based on core based statistical area (CBSA) boundaries as defined by the U.S. Office of Management and Budget (OMB), July 1, 2018, population estimates from the U.S. Census Bureau, and historical ambient air monitoring data. Minimum monitoring requirements for O₃, PM_{2.5}, and PM₁₀, only apply to metropolitan statistical areas (MSAs), which are a subset of CBSAs. OMB currently defines 13 MSAs in the state of Alabama. These MSAs and the respective July 1, 2018, population estimates from the U.S. Census Bureau are shown in Table 1.

Table 1: Metropolitan Statistical Areas and July 1, 2018 Population Estimates

MSA Name	Population
Anniston-Oxford-Jacksonville, AL	114,277
Auburn-Opelika, AL	163,941
Birmingham-Hoover, AL	1,151,801
Columbus, GA-AL	305,451
Daphne-Fairhope-Foley, AL	218,022
Decatur, AL	152,046
Dothan, AL	148,245
Florence-Muscle Shoals, AL	147,149
Gadsden, AL	102,501
Huntsville, AL	462,693
Mobile, AL	413,757
Montgomery, AL	373,225
Tuscaloosa, AL	243,575

Monitoring Network Changes Proposed by the ADEM

The ADEM's Network Plan identified proposed changes to the state's ambient air monitoring network. The local agency monitoring programs are operated by the City of Huntsville Division of Natural Resources and Environmental Management (HDNREM), and the Jefferson County Department of Health (JCDH), who submit their own plans separately to the EPA. The EPA also responds to those plans separately. The EPA's rationale for approval or disapproval of specific network changes can be found below in the pollutant sections of this document. Monitors proposed for discontinuation and the EPA's determination are summarized in Table 2. Monitors proposed for reconfiguration, relocation, or monitor start-up and the EPA's determination are summarized in Table 3.

Table 2. Monitors Proposed for Discontinuation

Agency	AQS ID	Site Name	Pollutant	Type	Comments
ADEM	01-033-1002	Muscle Shoals	O ₃ , PM _{2.5}	SLAMS	Approved.
ADEM	01-069-0003	Dothan (Civic Center)	PM _{2.5}	SLAMS	Approved.
ADEM	01-069-0004	Dothan	O ₃	SLAMS	Approved.

Of the four state or local air monitoring station (SLAMS) monitors proposed for discontinuation above, neither of the O₃ monitors meet the requirements of 40 CFR §58.14(c)(1) - a probability of less than 10 percent that these monitors would exceed 80 percent of the applicable NAAQS during the next three years based on the levels, trends, and variability observed in the past. However, all four meet the requirement of 40 CFR §58.14(c)(6) for shutdown, and these four monitors have shown attainment with the applicable NAAQS during the previous five years. The monitors are not specifically required by an attainment plan or maintenance plan and the requirements in 40 CFR Part 58, Appendix D will continue to be met after these discontinuations. Each of the SLAMS monitors listed above are approved for discontinuation.

Table 3. Proposed Changes in Monitoring

Agency	AQS ID	Site Name	Pollutant	Type	Comments
ADEM	01-103-0011	Decatur	PM _{2.5}	SLAMS	Approved. Replacing non-FEM BAM 1020 with a Teledyne T640 FEM. Data will be NAAQS excluded during evaluation period.
ADEM	01-119-0003	Ward	PM _{2.5}	SLAMS	Approved. Replacing non-FEM BAM 1020 with a BAM 1022 FEM. Data will be NAAQS comparable upon installation.

The EPA approves the NAAQS exclusion for up to two years for the evaluation of the Teledyne T640 FEM at the Decatur site. During this time, the agency must continue operating the PM_{2.5} federal reference method (FRM) in order to meet the PM_{2.5} comparability assessment requirements. Also, the data from the T640 must be reported to AQS under parameter code 88101, and a NAAQS Exclusion should be added in the AQS metadata. Please let us know when the NAAQS Exclusion has been added and we will add our regional office concurrence.

While the replacement of the BAM 1020 with the BAM 1022 is approved at the Ward site, we cannot approve a NAAQS Exclusion of the BAM 1022 data since there is not a PM_{2.5} FRM concurrently operating. Once the BAM 1022 is installed and operating, any resulting data will be comparable to NAAQS and must be reported to AQS parameter code 88101.

Air Quality Index (AQI) Reporting

40 CFR § 58.50

AQI reporting is required for MSAs with populations of 350,000 or more. Five MSAs in the state of Alabama meet this criterion: Birmingham, Huntsville, Mobile, Montgomery, and Phenix City. The Network Plan indicates that an AQI is being reported in each of these MSAs. Thus, the state is meeting its AQI reporting requirements.

National Core (NCore) Monitoring Network
40 CFR Part 58, Appendix D, Section 3.0

Ambient air monitoring network design criteria for NCore sites are found in 40 CFR Part 58, Appendix D, Section 3.0. This section requires each state to operate at least one NCore site. States may delegate this requirement to a local agency.

Table 4. NCore Monitoring Sites

CBSAs	AQS IDs	Site Name	Requirement Met (Y/N)
Birmingham-Hoover, AL MSA	01-073-0023	North B'ham NCore	Y

The NCore site is operated by the JCDH. The NCore monitoring network described in the Network Plan meets all design criteria of 40 CFR Part 58.

O₃ Monitoring Requirements

40 CFR Part 58, Appendix D, Section 4.1 and Table D-2

Ambient air monitoring network design criteria for O₃ are found in 40 CFR Part 58, Appendix D, Section 4.1. This section requires a state, and where appropriate, local agencies operate O₃ sites for various locations depending upon area size and typical peak concentrations.

Table 5. Ozone Design Criteria – Minimum Required SLAMS Monitors

MSA	# Minimum Required SLAMS	# of SLAMS in Plan	AQS IDs (site name) of SLAMS in Plan	Requirement Met (Y/N)
Anniston-Oxford-Jacksonville, AL	0	0	N/A	Y
Auburn-Opelika, AL	0	0	N/A	Y
Birmingham-Hoover, AL	2	1*	01-117-0004 (Helena)	Y
Columbus, GA-AL	1	1	01-113-0003 (Phenix City)	Y
Daphne-Fairhope-Foley, AL	1	1	01-003-0010 (Fairhope)	Y
Decatur, AL	1	1	01-103-0011 (Decatur)	Y
Dothan, AL	0	0	N/A	Y
Florence-Muscle Shoals, AL	0	0	N/A	Y
Gadsden, AL	1	1	01-055-0011 (Southside)	Y
Huntsville, AL	2	0**	Covered by two sites in Huntsville	Y

Mobile, AL	2	2	01-097-0003 (Chickasaw) 01-097-2005 (Bay Road)	Y
Montgomery, AL	2	2	01-051-0004 (Wetumpka) 01-101-1002 (MOMS)	Y
Tuscaloosa, AL	1	1	01-125-0010 (Duncanville)	Y

*Additional monitors operated by JCDH fully meet this requirement.

**Additional monitors operated by HDNREM fully meet this requirement.

Table 6. Ozone Design Criteria – Non-SLAMS Monitors

CBSA	# Existing Non-SLAMS	Non-SLAMS Monitoring Type	AQS IDs (site name) of Non-SLAMS in Plan
None	1	CASTNET	01-049-9991 (Sand Mountain)

The proposed O₃ monitoring network described in the Network Plan meets the design criteria of 40 CFR Part 58.

CO Monitoring Requirements

40 CFR Part 58, Appendix D, Section 4.2

Ambient air monitoring network design criteria for CO are found in 40 CFR Part 58, Appendix D, Section 4.2. This section requires CBSAs with populations over one million but less than 2.5 million to operate one CO monitor collocated with a near-road NO₂ monitor, by January 1, 2017.

Table 7. CO Design Criteria – Minimum Required SLAMS Near-Road Monitors

CBSA	# Minimum Required Near-Road	# Near-Road in Plan	AQS IDs (site name) of Existing Near-Road in Plan	Requirement Met (Y/N)
Birmingham-Hoover	1	0	Covered by the JCDH	Y

The Regional Administrator required monitoring for CO are found in 40 CFR Part 58, Appendix D 4.2.2. The section states, “The Regional Administrators, in collaboration with states, may require additional CO monitors above the minimum number of monitors required in 4.2.1.” There is no additional CO monitoring required at this time.

Table 8. CO Design Criteria – Minimum Required SLAMS RA Required Monitors

CBSA	# Minimum RA Required	# RA in Plan	AQS IDs (site name) of RA Required in Plan	Requirement Met (Y/N)
None	0	0	N/A	Y

The proposed CO monitoring network described in the Network Plan meets all design criteria of 40 CFR Part 58.

NO₂ Monitoring Requirements

40 CFR Part 58, Appendix D, Section 4.3

Ambient air monitoring network design criteria for NO₂ are found in 40 CFR Part 58, Appendix D, Section 4.3. Three types of NO₂ monitoring are required: near-road, area-wide, and Regional Administrator required. These types of NO₂ monitoring are described in Sections 4.3.2, 4.3.3, and 4.3.4, respectively.

Table 9. NO₂ Design Criteria - Minimum Required SLAMS Near-Road Monitors

CBSA	# Minimum Required Near-Road	# Near-Road in Plan	AQS IDs (site name) of Existing Near-Road in Plan	Requirement Met (Y/N)
Birmingham-Hoover	1	0	Covered by the JCDH	Y

Table 10. NO₂ Design Criteria - Minimum Required SLAMS Area-Wide Monitors

CBSA	# Minimum Required Area-Wide	# Area-Wide in Plan	AQS IDs (site name) of Area-Wide in Plan	Requirement Met (Y/N)
None	0	0	N/A	Y

Ambient air monitoring network design criteria for the Regional Administrator required NO₂ monitoring, often referred to as RA-40 monitoring, are found in 40 CFR Part 58, Appendix D, Section 4.3.4. This section states that “the Regional Administrators, in collaboration with states, must require a minimum of forty additional NO₂ monitoring stations nationwide in any area, inside or outside of CBSAs, above the minimum monitoring requirements, with a primary focus on siting these monitors in locations to protect susceptible and vulnerable populations. The Regional Administrators, working with states, may also consider additional factors to require monitors beyond the minimum network requirement.” However, not all states are required to have such monitors and the EPA did not propose any for Alabama. As a result, the state did not include a Regional Administrator required NO₂ monitor in its Network Plan. The full list of NO₂ monitors identified by the Regional Administrators can be found on the EPA’s website at <http://www.epa.gov/ttnamti1/svpop.html>.

Table 11. NO₂ Design Criteria - Minimum Required SLAMS RA-40 Monitors

CBSA	# Minimum Required RA-40	# RA-40 in Plan	AQS IDs (site name) of RA-40 in Plan	Requirement Met (Y/N)
None	0	0	N/A	Y

The NO₂ monitoring network described by the ADEM in its Network Plan meets all design criteria of 40 CFR Part 58.

SO₂ Monitoring Requirements

40 CFR Part 58, Appendix D, Section 4.4

Ambient air monitoring network design criteria for SO₂ are found in 40 CFR Part 58, Appendix D, Section 4.4. This section requires that the population weighted emissions index (PWEI) be calculated by states for each CBSA. As a result, the SO₂ monitoring site(s) required in each CBSA will satisfy minimum monitoring requirements if the monitor(s) is sited within the boundaries of the parent CBSA and is of the following site types: population exposure, maximum concentration, source-oriented, general background, or regional transport. A SO₂ monitor at an NCore station may satisfy minimum monitoring requirements if that monitor is located within a CBSA with minimally required monitors consistent with Appendix D, Section 4.4.

Table 12. SO₂ Design Criteria – Minimum Required SLAMS PWEI Monitors

CBSA	# Minimum Required PWEI	# PWEI in Plan	AQS IDs (site name) of Existing PWEI in Plan	Requirement Met (Y/N)
Birmingham-Hoover	2	0*	Covered by the JCDH	Y
Mobile	1	1	01-097-0003 (Chickasaw)	Y

* JCDH operates three SO₂ monitors in the Birmingham CBSA.

The Regional Administrator may require additional SO₂ monitoring stations above the minimum number of monitors required in 40 CFR Part 58, Appendix D, Section 4.4.2, where the minimum monitoring requirements are not sufficient to meet monitoring objectives. There is no additional SO₂ monitoring required at this time.

Table 13. SO₂ Design Criteria – Minimum Required SLAMS RA Monitors

CBSA	# Minimum RA Required	# RA-Required in Plan	AQS IDs (site name) of Existing SLAMS in Plan	Requirement Met (Y/N)
None	0	0	N/A	Y

The SO₂ Data Requirements Rule requires that agencies identify and characterize air quality around large sources of SO₂. By January 15, 2016 agencies were required to submit to the EPA a list of sources that emit 2,000 tons per year or more of SO₂, based on the most recently available data. ADEM has identified only one source that will be characterized using ambient monitoring.

Table 14. SO₂ Design Criteria – Data Requirement Rule Monitors

CBSA	# Minimum Required	# Required in Plan	AQS IDs (site name) of Existing SLAMS in Plan	Requirement Met (Y/N)
Birmingham-Hoover	1	1	01-117-9001 (L'hoist, Montevallo Plant)	Y

The proposed SO₂ monitoring network described in the Network Plan meets all design criteria of 40 CFR Part 58.

Pb Monitoring Requirements**40 CFR Part 58, Appendix A, Section 3.4****40 CFR Part 58, Appendix D, Section 4.5**

The monitoring requirements for Pb found at 40 CFR Part 58, Appendix D, Section 4.5 require that at a minimum, there must be one source-oriented SLAMS site located to measure the maximum Pb concentration in ambient air resulting from each non-airport Pb source which emits 0.50 or more tons per year and from each airport which emits 1.0 or more tons per year.

Table 15. Pb Design Criteria – Minimum Required SLAMS Source-Oriented Monitors

Source Name	CBSA	# Minimum Required Source-Oriented	# Source-Oriented in Plan	AQS IDs (site name) of Existing Source-Oriented in Plan	Requirement Met (Y/N)
Sanders Lead	Troy	1	1	01-109-0003 (Troy Lead)	Y

The Pb collocation requirements are found in 40 CFR Part 58, Appendix A, 3.4.4. Those requirements include that: 15 percent of the primary monitoring (not counting non-source oriented NCore sites in the primary quality assurance organization (PQAO)) are collocated and have at least one collocated quality control monitor (if the total number of monitors is less than three). These collocation requirements are assessed at the PQAO level.

Table 16. Pb Design Criteria – Minimum Required Collocated Monitors

PQAO	# Minimum Required Collocated	# Existing Collocated	AQS IDs (site name) of collocated sites in Plan	Requirement Met (Y/N)
ADEM	1	1	01-109-0003 (Troy Lead)	Y

The proposed Pb monitoring network described in the Network Plan meets all design criteria of 40 CFR Part 58.

PM₁₀ Monitoring Requirements**40 CFR Part 58, Appendix A, Section 3.3****40 CFR Part 58, Appendix D, Section 4.6 and Table D-4**

Ambient air monitoring network design criteria for PM₁₀ are found in 40 CFR Part 58, Appendix D, Section 4.6. This section requires the number of PM₁₀ stations in areas where MSA populations exceed 1,000,000.

Table 17. PM₁₀ Design Criteria – Minimum Required SLAMS Monitors

CBSA	# Minimum Required SLAMS	# SLAMS in Plan	AQS IDs (site name) of Existing SLAMS in Plan	Requirement Met (Y/N)
Montgomery	0-1	1	01-101-1002 (MOMS)	Y

The PM₁₀ collocation requirements for manual methods found in 40 CFR Part 58, Appendix A, 3.3.4. Those requirements include that: 15 percent of each network of manual PM₁₀ methods (at least one site) must be collocated, and the sites with collocated monitors should be among those measuring annual

mean concentrations in the highest 25 percent of the network. These collocation requirements are assessed at the primary quality assurance organization (PQAO) level.

Table 18. PM₁₀ Design Criteria – Minimum Required Collocated Monitors

PQAO	# Minimum Required Collocated	# Existing Collocated	AQS IDs (site name) of Existing SLAMS in Plan	Requirement Met (Y/N)
ADEM	1	1	01-101-1002 (MOMS)	Y

The proposed PM₁₀ monitoring network described in the Network Plan meets all design criteria of 40 CFR Part 58.

PM_{2.5} Monitoring Requirements

40 CFR Part 58, Appendix A, Section 3.2.3

40 CFR Part 58, Appendix D, Section 4.7 and Table D-5

Ambient air monitoring network design criteria for PM_{2.5} are found in 40 CFR Part 58, Appendix D, Section 4.7. This section requires the state and, where applicable, local agencies must operate the minimum number of required PM_{2.5} SLAMS sites listed in Appendix D, Table D-5.

Table 19. PM_{2.5} Design Criteria – Minimum Required SLAMS Monitors

MSA	# Minimum Required SLAMS	# of SLAMS in Plan	AQS IDs (site name) of SLAMS in Plan	Requirement Met (Y/N)
Anniston-Oxford-Jacksonville, AL	0	0	N/A	Y
Auburn-Opelika, AL	0	0	N/A	Y
Birmingham-Hoover, AL	3	0*	Covered by 6 sites in Jefferson County.	Y
Columbus, GA-AL	0	1	Phenix City (01-113-0003)	Y
Daphne-Fairhope-Foley, AL	0	1	Fairhope (01-003-0010)	Y
Decatur, AL	0	1	Decatur (01-103-0011)	Y
Dothan, AL	0	0	N/A	Y
Florence-Muscle Shoals, AL	0	0	N/A	Y
Gadsden, AL	0	1	Gadsden C. College (01-055-0010)	Y
Huntsville, AL	0	0**	Covered by one site in Madison County.	Y
Mobile, AL	0	1	Chickasaw (01-097-0003)	Y
Montgomery, AL	0	1	MOMS (01-101-1002)	Y
Tuscaloosa, AL	0	1	VA, Tuscaloosa (01-125-0004)	Y

*Additional monitors operated by JCDH fully meet this requirement

**Additional monitors operated by HDNREM fully meet this requirement.

The monitoring site in Muscle Shoals (AQS ID: 01-033-1002) was affected by a lightning strike, causing both the O₃ and PM_{2.5} monitors to fail. The O₃ monitor was replaced. Unfortunately, ADEM does not have another spare PM_{2.5} monitor. Since the site is being approved to shut down anyway, the EPA is approving the shutdown of this PM_{2.5} monitor as of August 5, 2019, with the last valid sample taken on August 4, 2019.

Per 40 CFR Part 58, Appendix A, Section 3.2.3, fifteen percent of each network of manual PM_{2.5} methods (at least one site) must be collocated. Forty (40) CFR Part 58, Appendix A, Section 3.2.3.1 states for each distinct monitoring method designation (FRM or FEM) that a PQAO is using for a primary monitor, the PQAO must have 15 percent of the primary monitors of each method designation collocated; and have at least one collocated quality control monitor. The first collocated monitor must be a designated FRM monitor.

Forty (40) CFR Part 58, Appendix A, Section 3.2.3.2 states for each primary monitor designated as an FEM used by the PQAO, 50 percent of the monitors designated for collocation (or the first if only one collocation is necessary) shall be collocated with a FRM quality control monitor and 50 percent of the monitors shall be collocated with a monitor having the same method designation as the FEM primary monitor.

Table 20. PM_{2.5} Design Criteria – Minimum Required Collocated Monitors

Agency	# Minimum Required Collocated	# Existing Collocated	AQS IDs (site name) of Existing SLAMS in Plan	Requirement Met (Y/N)
ADEM	2	2	01-101-1002 (MOMS) 01-113-0003 (Phenix City)	Y

The proposed PM_{2.5} monitoring network described in the Network Plan meets all design criteria of 40 CFR Part 58.

PM_{2.5} Near-road Monitoring Requirements

40 CFR Part 58, Appendix D, Section 4.7.1(b)(2)

Regulatory requirements in 40 CFR Part 58, Appendix D, 4.7.1(b)(2) require that CBSAs with a population of 1,000,000 or more persons, at least one PM_{2.5} monitor is to be collocated at a near-road NO₂ station. PM_{2.5} near-road monitoring was required in the Birmingham-Hoover CBSA by January 1, 2017.

Table 21. PM_{2.5} Design Criteria - Minimum Required SLAMS Near-Road Monitors

CBSA	# Minimum Required Near-Road	# Near-Road in Plan	AQS IDs (site name) of Existing Near-Road in Plan	Requirement Met (Y/N)
Birmingham-Hoover	1	0*	N/A	Y

*Near-road monitoring site operated by JCDH fully meets this requirement.

The proposed near-road PM_{2.5} monitoring network described in the Network Plan meets all design criteria of 40 CFR Part 58.

PM_{2.5} Continuous Monitoring Requirements
40 CFR Part 58, Appendix D, Section 4.7.2

Regulatory requirements for continuous PM_{2.5} monitoring require that the State, or where appropriate, local agencies must operate continuous PM_{2.5} analyzers equal to at least one-half (round up) the minimum required sites listed in Appendix D, Table D–5.

Table 22. PM_{2.5} Design Criteria – Minimum Required Continuous Monitors

MSA	# Minimum Required Continuous	# Continuous in Plan	AQS IDs (site name) of Existing Continuous in Plan	Requirement Met (Y/N)
Anniston-Oxford-Jacksonville, AL	0	0	N/A	Y
Auburn-Opelika, AL	0	0	N/A	Y
Birmingham-Hoover, AL	2	0*	N/A	Y
Columbus, GA-AL	1	1	01-113-0003 (Phenix City)	Y
Daphne-Fairhope-Foley, AL	0	0	N/A	Y
Decatur, AL	0	1	01-103-0011 (Decatur)	Y
Dothan, AL	0	0	N/A	Y
Florence-Muscle Shoals, AL	0	0	N/A	Y
Gadsden, AL	0	0	N/A	Y
Huntsville, AL	1	0**	N/A	Y
Mobile, AL	0	1	01-097-0003 (Chickasaw)	Y
Montgomery, AL	1	1	01-101-1002 (MOMS)	Y
Tuscaloosa, AL	0	0	N/A	Y

*Additional monitors operated by JCDH fully meet this requirement

**Additional monitors operated by HDNREM fully meet this requirement.

At least one required continuous analyzer in each MSA must be collocated with one of the required FRM/FEM/ARM monitors, unless at least one of the required FRM/FEM/ARM monitors is itself a continuous FEM or ARM monitor in which case no collocation requirement applies.

These minimum continuous PM_{2.5} monitoring requirements are being met by ADEM. Also, the continuous PM_{2.5} collocation requirements are being met in all MSAs.

The continuous PM_{2.5} monitoring network described in the Network Plan meets all design criteria of 40 CFR Part 58.

PM_{2.5} Background and Transport Sites
40 CFR Part 58, Appendix D, Section 4.7.3

Monitoring requirements in 40 CFR Part 58, Appendix D, Section 4.7.3 state that each State shall install and operate at least one PM_{2.5} site to monitor for regional background and at least one PM_{2.5} site to monitor for regional transport.

Table 23. PM_{2.5} Regional Background and Transport Monitors

Requirement	# Minimum Required	# in Plan	AQS IDs (site name) of Existing SLAMS in Plan	Requirement Met (Y/N)
Background	1	2	01-049-1003 (Crossville) 01-119-0003 (Ward)	Y
Transport	1	1	01-027-0001 (Ashland)	Y

PM_{2.5} Chemical Speciation Network (CSN)**40 CFR Part 58, Appendix D, Section 4.7.4**

Monitoring requirements in 40 CFR Part 58, Appendix D, Section 4.7.4 state that each State shall conduct chemical speciation monitoring and analyses at sites designated to be part of the PM_{2.5} Speciation Trends Network (STN). The selection and modification of these STN sites must be approved by the Administrator. The PM_{2.5} CSN includes STN stations and supplemental speciation stations that provide chemical species data of fine particulate.

Table 24. PM_{2.5} Chemical Speciation Network – Non-SLAMS Monitors

CBSA	AQS IDs (site name) of CSN Monitor in Plan
Columbus, GA-AL	01-113-0001 (Phenix City)

The operation of this monitor is consistent with the CSN review recently completed by the EPA.

Photochemical Assessment Monitoring Stations (PAMS)**40 CFR Part 58, Appendix D, Section 5.0**

With the promulgation of a new O₃ NAAQS on October 1, 2015, the EPA finalized changes to the PAMS requirements. The EPA is working on a proposed rule that will provide state and local agencies an additional two years from the current implementation date of June 1, 2019 to implement the PAMS program requirements. This extension is needed to provide all agencies the funding and equipment necessary to implement the program. This requirement will be met in Jefferson County and is the responsibility of the JCDH local agency. The JCDH will continue preparing to implement the program as resources allow with the goal of full implementation on or before June 1, 2021.

The EPA will work with the JCDH to address the implementation challenges of this new monitoring program. At this time, however, the PAMS requirement is being met in the state.

Non-SLAMS Monitoring

The Network Plan also includes the following non-SLAMS monitoring summarized in Table 25.

Table 25. Non-SLAMS Monitors

CBSA	Pollutant, AQS IDs (Site Name), and Monitor Type of Non-SLAMS Monitor in Plan
Columbus, GA-AL	PM _{2.5} continuous: 01-113-0003 (Phenix City), SPM PM _{2.5} Speciation: 01-113-0003 (Phenix City), SPM

Memoranda of Agreement (MOA) with Neighboring States

The ADEM does not have a MOA with neighboring states to address minimum monitoring requirements. They meet all the requirements independently.

Site Assessments

In reference to the Network Plan, 40 CFR Part 58.10(a)(1) states:

“The plan shall include a statement of whether the operation of each monitor meets the requirements of appendices A, C, D, and E of this part, where applicable. The Regional Administrator may require additional information in support of this statement.”

Site assessment information was included for all monitoring sites in the 2019 Network Plan. The EPA appreciates the inclusion of this information in the Network Plan, and the continued efforts to ensure that the monitoring network meets siting criteria requirements.